

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ART+COM Innovationpool GmbH,)	
)	
Plaintiff,)	C.A. No. 14-cv-217-RGA
)	
vs.)	DEMAND FOR JURY TRIAL
)	
GOOGLE INC.,)	
)	
Defendant.)	

**DECLARATION OF LISA M. THOMAS IN SUPPORT OF ACI'S OPPOSITION TO
GOOGLE'S MOTION TO STAY PROCEEDINGS PENDING
INTER PARTES REVIEW OF U.S. PATENT NO. RE44,550**

I, Lisa M. Thomas, declare as follows:

1. I am an attorney with the law firm of Baker Botts L.L.P., counsel of record to Plaintiff ART+COM Innovationpool GmbH in the above-captioned matter.
2. I submit this declaration in support of ACI's Opposition to Google's Motion to Stay Proceedings Pending *Inter Partes* Review of U.S. Patent No. RE44,550.
3. I have prepared this Declaration based on my personal knowledge and information I have reviewed. I have supervised the collection and copying of the documents submitted herewith.
4. Attached hereto as Exhibit 1 is a true and correct copy of Defendant's Initial Invalidity Contentions, excluding the exhibits referenced therein.
5. Attached hereto as Exhibit 2 is a true and correct copy of the first page of Exhibit D to Defendant's Initial Invalidity Contentions.
6. Attached hereto as Exhibit 3 is a true and correct copy of the Information Disclosure Statement considered by the Examiner in the application for RE44,550.

7. Attached hereto as Exhibit 4 is a true and correct copy of the Information Disclosure Statement considered by the Examiner in the application for RE41,428.

8. Attached hereto as Exhibit 5 is a true and correct copy of a letter from Defendant's counsel, Mr. David C. Vondle to Ms. Natalie Alfaro, dated March 19, 2015.

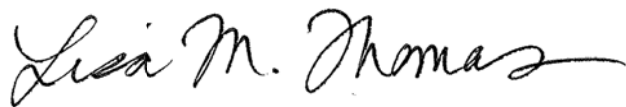
9. Attached hereto as Exhibit 6 is a true and correct copy of excerpts from the transcript of the hearing on the motion to stay in *Callwave Communication v. AT&T Mobility LLC*, CA No. 12-1701-RGA, held on September 16, 2014.

10. Attached hereto as Exhibit 7 is a true and correct copy of excerpts from the transcript of the Oral Argument Hearing on Motions to Dismiss and Stay in *Clouding IP, LLC v. Oracle Corporation*, CA No. 12-642 LPS, held on January 25, 2013.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 9, 2015

Respectfully submitted,

A handwritten signature in black ink that reads "Lisa M. Thomas". The signature is written in a cursive, flowing style with a long horizontal stroke at the end.

Lisa M. Thomas